

# Newbold Verdon Neighbourhood Plan

Report to the Parish Council and Neighbourhood Plan Steering Committee

## **SEA and the Neighbourhood Plan – Update and Considerations**

Date: 5<sup>th</sup> September 2019

This report is written to inform parish councillors and Newbold Verdon Neighbourhood Plan Steering Committee members of where we are in the process of achieving a neighbourhood plan. And to put forward for their consideration a number of options detailing how we might proceed, and the associated implications for each of these options.

### Background

#### **1. Lead up to pre-submission**

- a. The PC agreed to produce a NP in early 2016. Work got underway in June of that year and a draft Plan was drawn up by May 2018, which was presented to parishioners and other interested bodies under what is known as Regulation 14 of the Neighbourhood Planning (General) Regulations 2012
- b. In January of 2017, members of the Steering Committee met with representatives of Hinckley and Bosworth Borough Council (HBBC) planning department to discuss the process leading to the submission of the Plan to the public. We were aware that because our plan contained recommendations regarding housing development and the appropriate siting of housing within the parish that there may have to be a Strategic Environmental Assessment (SEA).
- c. A SEA is not in itself part of the regulations for neighbourhood planning, but it has to be conducted if it is deemed that such plans can be shown to demonstrate a potentially high impact on the environment. The process is both long and expensive and, in most cases, unnecessary for neighbourhood planning.
- d. To determine whether a SEA was necessary we had undertaken on our behalf a pre-screening report. HBBC commissioned this report and it was drawn up by an independent town and country planning consultancy, PlanitX. They concluded a SEA would not be required for our plan.
- e. What we failed to realise was that it was generally expected that a SEA, if it was required, would have to take place before making our pre-submission plan available to the public. The screening report confirmed that it would not be necessary, and we received no advice or guidance to the contrary.
- f. This has proven to be the point at which our NP process was knocked off course, though we did not know this at the time.

#### **2. Pre-Submission and the decision to request a SEA**

- a. We began the consultation with the public and other interested bodies on the ... May 2018. One of the statutory bodies to be consulted in the pre-submission process was Historic England, and their response to the Plan contained no objections. However, as part of the screening process for the SEA there was an obligation by HBBC to notify Historic England (as well as Natural England and the Environment Agency) and at this point in late July 2017 they expressed an opinion that a SEA would be necessary because the designated site in the NP could potentially impact on the historic environment of the parish, namely, the conservation area.
- b. Without any consultation with the Parish Council, HBBC determined that they should instruct a SEA to take place, thus halting the process of pre-submission – our current situation. Other Local Planning Authorities have stood by the screening opinion and found alternative solutions that have avoided the cost and delay associated with an SEA. AECOM have subsequently advised that their view is that an SEA should not have been undertaken

### 3. Completion of the SEA

- a. The SEA was undertaken by an independent consultancy, Aecom, commissioned by Locality the body employed by the government to oversee neighbourhood planning. The SEA process began in December of 2017 and we received the draft report in July of this year. The report concluded that the NP as it stands will have little negative impact on the environment and should be mainly positive. It did not believe there was any significant risk to the historical environment posed by the possible new development.

### 4. Moving Forward from this point

- a. Since receiving the report, we have had further discussions with Aecom about how this is taken forward within Regulation 14, pre-submission. This has also led to discussion with HBBC, advice from Locality and also from our consultancy company, YourLocale.
- b. Figure 1 below and on the next page sets out the response of each of the parties that have offered an opinion. The chart has been laid out to explain the following:
- What each party believes to be the current statutory position.
  - Any options each believes are open to us, the Qualifying Body’.
  - Possible risks associated with any option.
  - Reference in the appendices to the full documentation offered from each group.

**Figure 1**

Party	Current Statutory Position	Options	Risks	App
Aecom	The SEA Regulations do not reference Reg14, but neither do they reference other stages of plan making such as Reg19 for Local Plans. This is because they relate to a range of different plans. The key element of the Regs is that consultation must take place on a Draft plan. In relation to Neighbourhood Planning, Reg14 is the stage that the draft Plan is consulted upon. It is therefore natural that the SEA is consulted upon at this stage. If this hasn't taken place, it raises some concerns.	To consult on the SEA without inviting comments on the Plan again (eg a full Reg14)	I maintain that there remains some risk by consulting on the SEA on its own without inviting comment on the Plan again. However, I have said several times that the risk is low.	1
Locality	I can't add anything more to what Ian (AECOM) has said. We recognise that it has been a very frustrating process up until this point. However, we are unable to advise on a course of action besides the one Ian has recommended. Ultimately this is a decision for the district council.			2
Party	Current Statutory Position	Options	Risks	Ref
HBBC	The detailed response and follow-up email can be found in Appendices 3/4 The summary of their opinion is captured from the comments below.	a. Consult on the amended Plan and SEA Report through another Regulation 14 consultation	No risk  Medium risk.	3 4

	<p><i>It is apparent throughout various guidance notes that the reason why the SEA/Environmental Report needs to be consulted on at Regulation 14 (rather than Regulation 16), is that there is a need to demonstrate that the SEA has influenced the plan's development, and the plan and its policies have been amended in line with the SEA's recommendations.</i></p> <p>They also reference Locality's document (see above)</p>	<p>b. Consult on the SEA Environmental Report only to invite comments</p> <p>c. Proceed straight through to the Regulation 15 submission and consult on SEA Report and plan at Regulation 16.</p>	<p>Consultation on the plan itself has already been completed at Regulation 14, although the plan will/should have been amended in line with the SEA recommendations</p> <p>High risk involved should developers or other stakeholders challenge the process, as it could be seen this approach is not meeting regulation.</p> <p>However, there are cases where groups say that Regulation 16 is an appropriate time to consult on the SEA, given the late stage that SEA was screened in. Pros</p>	
Y/Locale	<p>The legislation refers to consulting on the SEA outcome with the public – not the formal range of statutory stakeholders required for Reg 14 – and for a reasonable period of time – not the minimum 6 weeks required for Reg 14. This has to be done prior to submission – which can be alongside Reg 14 not through it.</p>	<p>To consult specifically on the SEA with the people who are affected by it for a timescale that is appropriate seems the most appropriate way forward.</p>	<p>AECOM say that going without any consultation is a 'low risk' therefore undertaking the consultation required through the legislation is logically a lower risk than this.</p>	5

## SEA and the Neighbourhood Plan – Update and Considerations: Appendices 1

Email from Ian McCluskey, the Newbold Verdon Strategic Environmental Assessment lead for Aecom

**Context:** Responding to a request from YourLocale consultant on behalf of NVNP Steering Committee for clarification on proceeding forward with the neighbourhood plan in the light of the SEA and associated legislation. NB: The council he is referring to is HBBC.

**From:** McCluskey, Ian <[ian.mccluskey@aecom.com](mailto:ian.mccluskey@aecom.com)>

**To:** G KIRK <[gary.kirk@btinternet.com](mailto:gary.kirk@btinternet.com)>; John Wilkinson <[john.wilkinson@locality.org.uk](mailto:john.wilkinson@locality.org.uk)>

**Sent:** Monday, 12 August 2019, 11:47:52 BST

**Subject:** RE: Newbold Verdon SEA

Hi,

I have made my position clear lots of times now to the Council and the Group. I will therefore reiterate again my thoughts.

The SEA Regulations do not reference Reg14, but neither do they reference other stages of plan making such as Reg19 for Local Plans. This is because they relate to a range of different plans. The key element of the Regs is that consultation must take place on a **Draft plan**. In relation to Neighbourhood Planning, Reg14 is the stage that the draft Plan is consulted upon. It is therefore natural that the SEA is consulted upon at this stage. If this hasn't taken place, it raises some concerns.

I maintain that there remains some risk by consulting on the SEA on its own without inviting comment on the Plan again. However, I have said several times that the risk is **low**. This is my opinion though. The Council have come to their own opinion that there is a medium risk. There really isn't anything more I can do because I have made this point about the risk being low numerous times.

I really do see the frustrations of the group, and as I have stated before, I think that an SEA could have been screened out. However, again, this isn't something I can influence if the Council maintains that an SEA is necessary to meet legal obligations.

The best solution now is to just get on with whatever form of consultation is going to be undertaken. Any more deliberating will just delay things further.

Regards

Ian

## SEA and the Neighbourhood Plan – Update and Considerations: Appendix 2

Email from Locality to YourLocale consultant, Gary Kirk, seeking Locality's opinion in the light of Aecom's comments contained in Appendices 1.

Dear Gary

I can't add anything more to what Ian has said. We recognise that it has been a very frustrating process up until this point. However, we are unable to advise on a course of action besides the one Ian (*see Appendices 1*) has recommended. Ultimately this is a decision for the district council.

Kind regards,

**John Wilkinson**

**Neighbourhood Planning Officer**

**Locality**

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**We are the national membership network supporting community organisations to be strong and successful.**

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## SEA and the Neighbourhood Plan – Update and Considerations Appendices 3/4

**Appendix 3:** Initial correspondence from HBBC regarding how we might proceed with the NP in the light of the SEA. (see pages 9-13)

### Appendix 4

**Context:** Responding to a request from YourLocale consultant, Gary Kirk, on behalf of NVNP Steering Committee for clarification of HBBC position, following HBBC receiving Aecom's response.

On Wednesday, 21 August 2019, 15:58:03 BST, Rob Foers <[Rob.Foers@hinckley-bosworth.gov.uk](mailto:Rob.Foers@hinckley-bosworth.gov.uk)> wrote:

Afternoon Gary,

Thank you for your email. I have now had the opportunity to review your correspondence received in response to Fran's letter of the 31<sup>st</sup> July. I understand your main concern to be the level of risk attributed to the approaches set out in that letter, in particular the approach of consulting on the SEA report only.

The three approaches have various pros and cons associated with them and have been attributed a level of risk based on those pros and cons. The level of risk helps to differentiate the various approaches. The option to consult only on the SEA report has less risk than proceeding straight to Reg 15 and more risk than consulting on the SEA and plan through a second Reg 14 consultation. I am satisfied that the level of risk attributed to those approaches, and in particular the SEA report only approach is reasonable. The normal expectations would be to undertake SEA consultation at Reg 14 stage, and that an alternative method, even if within the parameters of the legislation, has the potential to attract an opportunity to challenge the plan, should someone wish to do so. Whilst it is unlikely that a challenge would lead to the plan failing it would have the potential to lead to further work, delays and uncertainty down the line. Therefore this approach has been attributed a higher level of risk than undertaking a full Reg 14 consultation.

The setting of risk is a subjective process and I appreciate that there will be differing views on this issue. Nevertheless I consider that the levels of risk associated with each approach set out in the letter is reasonable. Ultimately we are providing our professional advice to the Neighbourhood Plan Group to help support them make their own decisions for how to proceed. Whichever approach the group wish take it would be for them to justify, if necessary, why they have taken that approach.

I hope the above is of assistance for the meeting tomorrow and helps the group proceed towards the submission of their plan.

Regards

Rob

**Rob Foers**

**Principal Planning Officer (Policy)**

## SEA and the Neighbourhood Plan – Update and Considerations Appendix 5

Email received from Gary Kirk, YourLocale consultant, following a request for him to outline his advice to Newbold Verdon Steering Committee and Parish Council regarding how to proceed in the light of the SEA and Regulation 14.

Thanks for this Roger. These are my thoughts.

The Newbold Verdon NP should never have been subject to an SEA and HBBC recommending now that the final document is subject to a further Regulation 14 consultation is both unhelpful and unnecessary, and compounds earlier bad decisions taken by the Borough Council.

You will recall the issues that we faced when HBBC took the decision that an SEA was required, following the recommendation from Historic England without any challenge or understanding as to why one was necessary. Whereas the legislation requires SEAs to be undertaken only in 'limited circumstances' where there potentially a 'significant environmental impact', Historic England consider that one is necessary whenever a NP includes a residential allocation (I have an email from a Principal Adviser at Historic England who, in response to a question from a Planning Officer about the circumstances in which an SEA would be required, he answered 'if there are housing allocations it probably will, and if there aren't it probably won't'.

Despite a Screening Opinion that concluded that no SEA was required, HBBC made the decision to require a SEA without any consultation with the Qualifying Body.

HBBC justified this decision by saying in an email 'By disregarding the professional advice of a statutory consultation body by not undertaking a SEA, the Local Planning Authority are of the opinion that the Newbold Verdon Neighbourhood Plan would not meet the basic condition, referred to above, that will be tested by an independent examiner and the Plan would not succeed.'

I provided at a meeting with Council Officers details of Examination reports where the Examiner had endorsed the local planning authority in resisting the recommendation of Historic England. To say categorically therefore that failing to follow Historic England's recommendation would lead to the Plan failing is incorrect.

I said at the time that Historic England should also have been challenged over their recommendation that a SEA was required. They offered no further information than that which was taken into account when the SEA Screening was undertaken, that concluded that a SEA was not required. This process has happened routinely elsewhere and has resulted in an alternative and mutually agreeable approaches being taken which has saved both time and money.

Neighbourhood planning is built around the need for partnership working and consultation. It was therefore disappointing that the decision that a SEA was required was taken without any reference to the Qualifying Body.

Planning Practice Guidance states that '[The local planning authority should discuss the steps that the qualifying body needs to take and what needs to be produced in order to comply with the Environmental Assessment of Plans and Programmes Regulations 2004 as part of meeting its duty to advise or assist the qualifying body with neighbourhood planning](#)'. (Paragraph: 031 Reference ID: 11-031-20150209).

In these circumstances, taking the decision that a SEA is required without first discussing this with the Qualifying Body is unhelpful. This was compounded at the meeting with Officers where it was stated that there was no obligation to consult with the Qualifying Body and having a meeting with the Qualifying Body 'would not have changed the decision'.

The comment was made at the meeting that the decision was taken quickly because of the concerns raised by the Qualifying Body that Regulation 14 comments had been delayed, but failure to meet statutory timescales in one area does not justify decisions being taken without appropriate consultation elsewhere.

This flawed decision has cost 14 months so far and is now compounded by HBBC deciding that the outcome of the SEA should be consulted on through Regulation 14, thus creating a further delay of around 3 months.

At a meeting to discuss this recommendation, I asked Officers to justify their decision that consulting on the SEA only represented a 'medium risk' and was not advised. The only answer I received was to say that the paper put together by HBBC Officers was based on the recommendations of AECOM, who produced the report.

In fact, AECOM put in writing the conclusion that proceeding with a targeted consultation was a 'low risk'. They even went so far as to state that undertaking no consultation at all would be low risk. The author of the report said 'I have made my position clear lots of times now to the Council', but it seems the Council were not listening.

The written justification provided by HBBC in an email dated 21 August 2019 said 'The option to consult only on the SEA report has less risk than proceeding straight to Reg 15 and more risk than consulting on the SEA and plan through a second Reg 14 consultation. I am satisfied that the level of risk attributed to those approaches, and in particular the SEA report only approach is reasonable'.

So, far from following the recommendations of AECOM as Officers said at the meeting to discuss this issue, the Council has gone against it. It is illogical to suggest that three courses of action represent 'low, medium and high' risk without looking at each option on its own merit.

The fact that the SEA supports the policies in the NP and offers very minor recommendations for change only reinforces the belief that proceeding with a targeted consultation is low risk and the appropriate approach in this situation.

I believe that the advice from HBBC has been flawed at each stage in the process and unless HBBC can state why a targeted consultation is medium risk, the advice from AECOM, who wrote the SEA and are the experts in this matter should be the advice that is listened to most carefully.

Best wishes.

Gary

**Gary Kirk MA, CQSW, MCIH**

Managing Director

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## Appendix 3

### SEA and the Neighbourhood Plan – Update and Considerations letter from Fran Belcher

**Bill Cullen** MBA (ISM), BA(Hons) MRTPI  
**Chief Executive**



**Hinckley & Bosworth  
Borough Council**

Please ask for: Fran Belcher  
Direct dial/ext: 01455 255749  
Direct fax: N/A  
Email: [planningpolicy@hinckley-bosworth.gov.uk](mailto:planningpolicy@hinckley-bosworth.gov.uk)  
Your ref:  
Our ref: SEA14NEWBOLDPLAN  
Date: 31/07/2019

**FAO: Newbold Verdon Parish Council and Newbold Verdon Neighbourhood Plan Group. Newbold**

**Verdon Neighbourhood Plan, Regulation 14 consultation and SEA Consultation**

Dear Heather,

I am writing in response to issues you have raised with us in relation to the SEA of the emerging Newbold Verdon Neighbourhood Plan and the associated consultation period. I have set everything out in letter format to be clear and so I could provide links to references where applicable, and with an overall recommendation at the end.

#### Receipt of the SEA Environmental Report and corresponding consultation

Thank you for keeping HBBC informed on the progress of the Strategic Environment Assessment (SEA) in partnership with AECOM. Recently it came to the attention of the Borough Council that AECOM were recommending to re-consult via a Regulation 14 consultation following the receipt of the SEA report, and following the amendments to the plan as per the SEA's recommendations. As the Reg 14 consultation has already been undertaken (July 2018), the Borough Council needed to follow up this recommendation and confirm whether there is a legal obligation for another Reg 14 consultation on the SEA. Ian McClusky from AECOM highlighted that not following the recommended procedure will come with risks, and following this recommendation we have explored the matter further and set out our findings below. The Borough Council emailed Locality and sought advice on the matter, and did our own research into the legislation and guidance.

The NPPG provides some guidance on when the SEA environmental report should be published for consultation. The diagram in the NPPG (Strategic environmental assessment and sustainability appraisal) Paragraph 033 suggests this is at Regulation 14 Pre-Submission stage (see Appendix 1). Of note is that the NPPG, Paragraph 080<sup>1</sup> under the 'Pre-Submission' stage, references that at 'Presubmission publicity and consultation' the Qualifying Body, where European Obligations apply, complies with relevant publicity and consultation requirements.

The consultation requirements are referenced in The Environmental Assessment of Plans and Programmes Regulations 2004, regulation 13<sup>2</sup>, as below:

<sup>1</sup> National Planning Policy Guidance, Neighbourhood Planning, Para 080, Reference ID: 41-080-20180222 - <https://www.gov.uk/guidance/neighbourhood-planning--2>

<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 13 - <http://www.legislation.gov.uk/ukxi/2004/1633/regulation/13/made>

### Consultation procedures

13.—(1) Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying environmental report (“the relevant documents”) shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.

(2) As soon as reasonably practicable after the preparation of the relevant documents, the responsible authority shall—

- (a) send a copy of those documents to each consultation body;
- (b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority’s opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental Assessment of Plans and Programmes Directive (“the public consultees”);
- (c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, or from which a copy may be obtained; and
- (d) invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.

(3) The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.

(4) The responsible authority shall keep a copy of the relevant documents available at its principal office for inspection by the public at all reasonable times and free of charge.

(5) Nothing in paragraph (2)(c) shall require the responsible authority to provide copies free of charge; but where a charge is made, it shall be of a reasonable amount

This is clear that the consultation procedures apply to a ‘draft’ plan, rather than a submitted plan. It is also clear in the NPPG Para 040<sup>3</sup>, that the environmental report must be available alongside the ‘draft’ plan, and that these procedures can be incorporated into the pre-submission publicity and consultation.

It is apparent throughout various guidance notes that the reason why the SEA/Environmental Report needs to be consulted on at Regulation 14 (rather than Regulation 16), is that there is a need to demonstrate that the SEA has influenced the plan’s development, and the plan and it’s policies have been amended in line with the SEA’s recommendations. At Regulation 16 amendments to plan would no longer be made by the Qualifying Body, and whilst it is possible that comments on the SEA are made at this stage and the examiner amends the plan accordingly, this is not advisable, and could leave the plan open to formal challenge.

In the response from Locality they have advised the following: *“The risk of post referendum legal challenge, if an SEA is screened in and not submitted at regulation 14, as described by AECOM, is worth considering. There may also be a risk that the independent examiner has a problem with the submission if SEA was not submitted at regulation 14. The risk of legal challenge may be one of judicial review and this is a method developers have used on a number of neighbourhood plans in the past, particularly areas of high land value.”*

As can be seen in the SHELAA (2017/18) and with the recent publication of the Borough’s less than five year supply, there is a lot of developer interest in the Borough, and it is especially worth noting that developers are already actively submitting representations on all of the Neighbourhood Plan’s across the borough. It would be reasonable to expect developers to continue closely scrutinising neighbourhood plans in the borough, and if opportunities to consult have been missed, this will likely be questioned through the Regulation 16 and Examination process.

From what AECOM and Locality have stated, and through our own research, there are certain levels of risk that come with various routes going forward. I have included a table below which lists the potential ways forward, and the associated risks.

<sup>3</sup> National Planning Policy Guidance, Strategic environmental assessment and sustainability appraisal, Para 040, Reference ID: 11-040-20140306 - <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Approach	Time implications	Risk	Pros and cons
Consult on the amended Plan and SEA Report through another Regulation 14 consultation	6 week consultation	No risk	Pros: No risk involved, meets the regulations as required, and lessens opportunities for challenge.  Cons: Delays the project plan by 6 weeks, potentially lose community appetite for plan.
Consult on the SEA Environmental Report only to invite comments	3-4 week focused consultation on just the SEA Environmental Report.	Medium risk.  Consultation on the plan itself has already been completed at Regulation 14, although the plan will/should have been amended in line with the SEA recommendations.	Pros: Reduces the risk of community and other stakeholders saying they didn't have chance to see the SEA before the Plan was submitted. Shortens consultation burden.  Cons: Delays the project plan by 3-4 weeks. Does not invite comments on the amended draft plan and supporting documents alongside the SEA report. May invite opportunity to challenge the consultation procedure.
Proceed straight through to the Regulation 15 submission and consult on SEA Report and plan at Regulation 16.	No time implication. Consultation alongside the plan at Regulation 16.	High risk involved should developers or other stakeholders challenge the process, as it could be seen this approach is not meeting regulation.  However, there are cases where groups say that Regulation 16 is an appropriate time to consult on the SEA, given the late stage that SEA was screened in.	Pros: Quickest approach. Most likely to maintain community appetite for the NDP.  Cons: Risk of challenge on the grounds that the SEA consultation was not early and effective alongside an amended draft plan.

It is also important to note that the plan has been amended since the original Regulation 14 consultation, and other amendments may be made following a meeting with Bloor Homes and the Borough Council to discuss the affordable housing provision on the allocation site. It would be credible to re-consult on this amended plan alongside the SEA Environmental Report.

Notwithstanding the above, the Local Planning Authority would recommend the following:

- Amend the plan in-line with the SEA recommendations and write an accompanying statement outlining how they have amended the plan to address the SEA/consultation bodies concerns. This will then be a crucial piece of evidence during examination which will support your site allocation, and consequently your whole plan.
- Concurrently, re-consult on a Regulation 14 consultation for 6 weeks, inviting comments on the SEA Environmental Report, the amended draft plan, the supporting statement on the plan's amendments, and all supporting documents.

I would just like to re-iterate that all of the above is only advice, and we, as planning professionals, are offering guidance as to how we think the plan should best proceed as per the SLA between the LPA and the Parish Council. It is Newbold Verdon's decision on how their plan is taken forward, however post receipt of the examiners report, the LPA has to be satisfied that the plan meets all of the basic conditions for the plan to proceed to referendum.

I hope all of the above is clear, open and constructive, and I hope we can work together to rectify any issues so we can move positively towards the plan's submission over the coming months. We believe that it was best to set this all out in letter format so everything was as clear and concise as possible, however we are happy to answer any queries you may have.

Yours faithfully,



Fran Belcher  
Planning Officer, Policy

Development Services  
Hinckley and Bosworth Borough Council

Appendix 1 (from HBBC)

Strategic environmental assessment process

Neighbourhood plan preparation

